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8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA

10 UNITED STATES OF AMERICA, *ex. rel.*,
11 Plaintiff,

12 JAMES R. ADAMS and PUOY K.
PREMSRIRUT,

13 Relators,
14

15 vs.

16 AURORA LOAN SERVICES, LLC, et al.,
17

Defendants.

Case No.: 2:11-cv-00535-RCJ-PAL

**DECLARATION IN SUPPORT OF
EMERGENCY MOTION FOR AN
EXTENSION OF THE DEADLINE FOR
RESPONSIVE PLEADINGS**

18 I, Ariel Stern, declare as follows:

19 1. I am a shareholder at Akerman Senterfitt, LLP, counsel for CitiMortgage, Inc. I
20 submit this Declaration in support of Defendant's Emergency Motion for an Extension of the
21 Deadline for Responsive Pleadings. I have personal knowledge of the facts contained in this
22 declaration and if called to testify about them, I could do so competently.

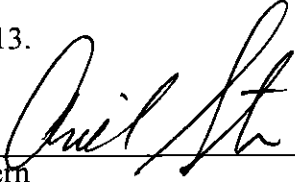
23 2. I was retained by CitiMortgage for purposes of this litigation on February 12, 2013.
24 On February 13, 2013, I contacted opposing counsel Sigal Chattah to seek an extension of time to
25 file a responsive pleading. I called Ms. Chattah and left a voice message requesting a call-back. I
26 also sent an e-mail in which I requested a 60-day extension of my client's responsive pleading
27 deadlines. While I was not able to communicate with Ms. Chattah via phone, my e-mail explained
28 that, in my view, the complexity of the case and the potential efficiency gains from a coordinated

1 briefing schedule with the other defendants make the requested extension appropriate. I also
2 explained that I had been retained only the day before, and more time was needed to prepare my
3 client's responsive pleading. Finally, I noted that the requested extension was consistent with the
4 extension sought by certain other defendants in their Motion For an Extension of the Deadline for
5 Responsive Pleadings (See Docket No. 66 ¶ 3.) Ms. Chattah, by e-mail, denied the request.

6 3. I informed Ms. Chattah that CitiMortgage would file this emergency motion seeking
7 approximately a 60-day extension.

8 I swear under penalty of perjury that the foregoing is true and correct.

9 DATED this 13th day of February, 2013.

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12 _____
13 Ariel Stern
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CERTIFICATE OF SERVICE

This is to certify that on the 13th day of February, 2013, I served via the CM/ECF electronic filing system and/or deposited in the United States Mail, postage prepaid, a true and correct copy of the foregoing **DECLARATION IN SUPPORT OF EMERGENCY MOTION FOR AN EXTENSION OF THE DEADLINE FOR RESPONSIVE PLEADINGS**, and addressed to the following:

Sigal Chattah, Esq.
5875 S. Rainbow Blvd
Suite 204
Las Vegas, NV 89118

Attorney for Relators

/s/ Debbie Julien
An employee of Akerman Senterfitt LLP

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